

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE; DR.
ANDREA WESLEY; DR. JOSEPH WESLEY;
ROBERT EVANS; GARY FREDERICKS; PAMELA
HAMNER; BARBARA FINN; OTHO BARNES;
SHIRLINDA ROBERTSON; SANDRA SMITH;
DEBORAH HULITT; RODESTA TUMBLIN; DR.
KIA JONES; MARCELEAN ARRINGTON;
VICTORIA ROBERTSON,

Plaintiffs,

vs.

STATE BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, *in his official capacity as Governor of
Mississippi*; LYNN FITCH, *in her official capacity as
Attorney General of Mississippi*; MICHAEL WATSON,
*in his official capacity as Secretary of State of
Mississippi,*

Defendants,









AND

MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE,

Intervenor-Defendant.

**CIVIL ACTION NO.
3:22-cv-734-DPJ-HSO-LHS**



PLAINTIFFS' EXHIBIT LIST






Ex. No.	Document Description	Sponsor	ID.	EVID.
2-26-2024 PTX-001	August 28, 2023 Report of William Cooper, including all exhibits and appendices thereto			X
2-26-2024 PTX-002	November 15, 2023 Rebuttal Report of William Cooper, including all exhibits and appendices thereto			X
PTX-003	Mississippi Association of Planning and Development Districts – 2022 Directory (http://mspdds.org/images/2022/2022-Directory.pdf)			
2-26-2024 PTX-004	December 22, 2023 Amended Report of Dr. Lisa Handley, including all appendices thereto			X
2-26-2024 PTX-005	August 28, 2023 Report of Dr. Jordan Ragusa, including all exhibits and appendices thereto			X
2-26-2024 PTX-006	November 27, 2023 Amended Rebuttal Report of Dr. Jordan Ragusa, including all exhibits and appendices thereto			X
2-27-2024 PTX-007	February 5, 2024 Report of Dr. Robert Luckett, including all exhibits and appendices thereto	Dr. Robert Luckett	X	
2-26-2024 PTX-008	November 14, 2023 Second Amended Report of Dr. D'Andra Orey, including all exhibits and appendices thereto			X
2-26-2024 PTX-009	November 22, 2023 Responsive Expert Report of Dr. D'Andra Orey,			X
PTX-010	January 29, 2024 Second Rebuttal Report of Dr. Jordan Ragusa, including all exhibits and appendices thereto			
PTX-011	Voter File BISG dataset used in Dr. Orey's BISG analysis, named "ms voter file bisg birdie.csv"			
3-6-2024 PTX-012	Ansolahehere, Fraga, and Schaffner (2022). <i>The Current Population Survey Voting and Registration Supplement Overstates Minority Turnout</i> , The Journal of Politics https://www.journals.uchicago.edu/doi/abs/10.1086/717260		X	
2-29-2024 PTX-013	February 5, 2024 Report of Dr. Marvin King, including all exhibits and appendices thereto	Dr. Marvin King	X	

Ex. No.	Document Description	Sponsor	ID.	EVID.
2-29-2024 PTX-014	November 15, 2023 Report of Dr. Marvin King, including all exhibits and appendices thereto	Dr. Marvin King	X	
PTX-015	Exhibit 5 to Deposition of Dr. Jordan Ragusa, <i>Old Voters, New Voters, and the Personal Vote: Using Redistricting to Measure the Incumbency Advantage</i> , American Journal of Political Science			
PTX-016	Exhibit 6 to Deposition of Dr. Jordan Ragusa, <i>Revisiting Majority-Minority Districts and Black Representation</i> , Political Research Quarterly			
PTX-017	Exhibit 7 to Deposition of Dr. Thomas Brunell, Brunell, Anderson, & Cremona 2008, <i>Descriptive Representation, District Demography, and Attitudes toward Congress Among African Americans</i> , Legislative Studies Quarterly			
3-6-2024 PTX-018	Exhibit 8 to Deposition of Dr. Thomas Brunell, Solowej, Martinek, & Brunell 2005, <i>Partisan Politics: The Impact of Party in the Confirmation of Minority and Female Federal Court Nominees</i> , Party Politics		X	
3-6-2024 PTX-019	Exhibit 10 to Deposition of Dr. Thomas Brunell, Lublin, Handley, Brunell & Grofman 2019, <i>Minority Success in Non-Majority Minority Districts: Finding the "Sweet Spot,"</i> The Journal of Race, Ethnicity, and Politics		X	
2-26-2024 PTX-020	Exhibit 16 to Deposition of Dr. Thomas Brunell, Executive Order No. 81 (June 11, 1971)			X
2-26-2024 PTX-021	Exhibit 23 to Deposition of Dr. Thomas Brunell, Ansolabehere, Schaffner, and Luks, <i>Guide to the 2020 Cooperative Election Study</i>			X
2-26-2024 PTX-022	Exhibit 24 to Deposition of Dr. Thomas Brunell, Mississippi Sample of 2020 Cooperative Election Study Data			X
2-26-2024 PTX-023	Exhibit 25 to Deposition of Dr. Thomas Brunell, Mississippi Sample			X

Ex. No.	Document Description	Sponsor	ID.	EVID.
	of 2020 Cooperative Election Study Data (Coded)			
2-26-2024 PTX-024	Exhibit 26 to Deposition of Dr. Thomas Brunell, Mississippi Sample of 2020 Cooperative Election Study Data (Coded and Sorted)			X
2-26-2024 PTX-025	U.S. Census Bureau, <i>Frequently Asked Questions (FAQs) About Voting and Registration</i> , https://www.census.gov/topics/public-sector/voting/about/faqs.html			X
3-6-2024 PTX-026	<i>Clarno v. Fagan</i> , Excerpt of Special Master's Report (Or. Circuit Ct. Nov. 5, 2021)		X	
	PTX-027 <i>Clarno v. Fagan</i> , Panel Decision (Or. Circuit Ct. Nov. 24, 2021)			
3-6-2024 PTX-028	<i>Ohio A. Philip Randolph Institute v. Householder</i> , Op. Excerpt (S.D. Ohio May 3, 2019)		X	
3-6-2024 PTX-029	<i>Common Cause v. Lewis</i> , Op. Excerpt, (NC Sup. Ct. Sept. 3, 2019)		X	
	PTX-030 <i>Szeliga v. Lamone</i> , Op. Excerpt (Md. Circuit Ct. Mar. 25, 2022)			
	PTX-031 Expert Report of Dr. Thomas Brunell, <i>Szeliga v. Lamone</i>			
3-6-2024 PTX-032	<i>Lopez v. Abbott</i> , 339 F.Supp.3d 589 (S.D. Tex. 2018) (excerpt)		X	
3-6-2024 PTX-033	<i>Flores v. Town of Islip</i> , 382 F.Supp. 3d 197 (E.D.N.Y. 2019) (excerpt)		X	
3-6-2024 PTX-034	<i>NAACP, Spring Valley Branch v. East Ramapo Central School District</i> , 462 F.Supp.3d 368 (S.D.N.Y. 2020)		X	
3-6-2024 PTX-035	<i>Alpha Phi Alpha Fraternity, Inc. v. Raffensperger</i> , 587 F.Supp.3d 1222 (N.D.Ga. 2022) (excerpt)		X	
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PTX-045	SDT-SJLCRR-001330- Letter from Senator Melanie Sojourner to James F. Ted Booth – March 24, 2022			
PTX-046	Carson, E. A. “Prisoners in 2020 - Statistical Tables.” BJS.OJP.Gov. U.S. Department of Justice, https://bjs.ojp.gov/content/pub/pdf/p20st.pdf			
PTX-047	NAACP, <i>History of Lynching in America</i> , https://naacp.org/find-resources/history-explained/history-lynching-america			
PTX-048	Pittman, Ashton. “GOP Mailers Misleadingly Paint Espy as a Criminal.” JacksonFreePress.Com. Jackson Free Press, November 2, 2018. Ashton Pittman, “GOP Mailers Misleadingly Paint Espy as a Criminal,” Jackson Free Press (Nov. 2, 2018), https://www.jacksonfreepress.com/news/2018/nov/02/gop-mailers-misleadingly-paint-espy-criminal/			
PTX-049	Angelo Dagonel, Soichiro Yamauchi. 2023. “The Geography of Racially Polarized Voting: Calibrating Surveys at the District Level.” American Political Science Review https://doi.org/10.1017/S0003055423000436			
PTX-050	Chris Danielson. After Freedom Summer: How Race Realigned Mississippi Politics, 1965-1986. Gainesville: University Press of Florida, 2011, pp.173-188;			

Ex. No.	Document Description	Sponsor	ID.	EVID.
PTX-051	McMillen, Neil R. 1989. <i>Dark Journey: Black Mississippians in the Age of Jim Crow</i> . Champaign, Illinois: University of Illinois Press, p. 41-44.			
PTX-052	Equal Justice Initiative. <i>Lynching in America: Confronting the Legacy of Racial Terror</i> . 3rd Edition. https://lynchinginamerica.eji.org/report/ , pp.30-33, 39-40.			
2-26-2024 PTX-053	002057 – Public Materials from Joint Committee Meetings (SDT-SJLCRR-002057-2070)			X
2-26-2024 PTX-054	Benchmark House Data (SDT-Upchurch-000006)			X
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PTX-056	“Population of the United States in 1860: Mississippi.” 1860 U.S. Census: Statistics of the United States. U.S. Census Bureau. https://www2.census.gov/library/publications/decennial/1860/population/1860a-22.pdf , p.270.			
PTX-057	State of Mississippi. Mississippi Constitution of 1890. https://www.mshistorynow.mdah.ms.gov/issue/mississippi-constitution-of-1890-as-originally-adopted .			
PTX-058	“Population of the United States at Each Census, from 1790 to 1900.” In Statistical Abstract of the United States, 1901. 24th ed. Washington: Government Printing Office, 1902, p.7			
PTX-059	Historical Statistics of the United States, Colonial Times to 1970. Chapter Y, Government, Elections and Politics. “Voter participation in presidential elections by state: 1824 to 1968. Washington: Government Printing Office, 1975, pp. 1067, 1072.			
PTX-060	Medgar W. Evers. “News and Action.” NAACP Mississippi State Office. April 11, 1958. https://www.crmvet.org/docs/5804_naap_ms_news.pdf			

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PTX-061	“Census of Population: 1960.” The Eighteenth Decennial Census of the United States. Volume 1: Characteristics of the Population. Part 26: Mississippi. U.S. Department of Commerce. https://www2.census.gov/library/publications/decennial/1960/population-volume-1/37745223v1p26.zip , p.viii; U.S.			
PTX-062	Frank R. Parker. Black Votes Count: Political Empowerment in Mississippi after 1965. Chapel Hill: University of North Carolina Press, 1990, p.xv, 45, 50			
PTX-063	U.S. Department of Justice Civil Rights Division. “Voting Determination Letters for Mississippi.” https://www.justice.gov/crt/voting-determination-letters-mississippi .			X
PTX-064	Letter, Acting Assistant U.S. Attorney General, Civil Rights Division, James P. Turner to John P. Fox, Esq., February 27, 1990. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/MS-2100.pdf , pp.1 and 2.			X
PTX-065	Letter, Assistant U.S. Attorney General, Civil Rights Division, Deval Patrick to Jeffery M. Navarro, December 4, 1995. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/MS-2630.pdf , pp.1, 5.			X
PTX-066	Letter, Assistant U.S. Attorney General, Civil Rights Division, Thomas E. Perez to Kenneth Dreher, Esq., and David Wade, Senior Planner, December 3, 2012. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/1_121203_0.pdf , p.2.			X
PTX-067	Isabelle Katz Pinzler, Acting Assistant Attorney General, to Sandra M. Shelson, Special Assistant Attorney General, State of Mississippi,			X

3-6-2024

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3-6-2024

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	September 22, 1997. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/MS-2650.pdf			
PTX-068	World Population Review. “Black Poverty Rate by State [Updated January 2023].” https://worldpopulationreview.com/state-rankings/black-poverty-rate-by-state			
PTX-069	Article 8, Mississippi Constitution of 1868. https://mshistorynow.mdah.ms.gov/issue/mississippi-constitution-of-1868			
PTX-070	“Racial Facts.” Jackson Free Press. Jackson Free-Press, Accessed August 19, 2023. https://jacksonfreepress.media.clients.ellingtoncms.com/news/documents/2017/11/15/CC_Racial_Facts.pdf			
PTX-071	“H.R. 5905.” Congress.Gov. House of Representatives, November 5, 2021. https://www.congress.gov/bills/117th-congress/house-bill/5905/text?s=1&r=76			
PTX-072	“1948 Presidential General Election Results.” US Election Atlas.Org. Dave Leip’s Election Atlas, Accessed August 19, 2023. https://uselectionatlas.org/RESULTS/national.php?year=1948			
PTX-073	“1964 Presidential General Election Results.” US Election Atlas.Org. Dave Leip’s Election Atlas, Accessed August 19, 2023. https://uselectionatlas.org/RESULTS/national.php?year=1964			
PTX-074	“1968 Presidential General Election Results.” US Election Atlas.Org. Dave Leip’s Election Atlas, Accessed August 19, 2023. https://uselectionatlas.org/RESULTS/data.php?year=1968&datatype=national&def=1&f=0&off=0&elect=0			
PTX-075	Tilley, Brian P. 2020. “I Am the Law and Order Candidate”: A Content Analysis of Donald Trump’s Race-			



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	Baiting Dog Whistles in the 2016 Presidential Campaign, Psychology 11 (pp. 1941-1974).			
PTX-076	Schaffner, Brian F., Matthew Macwilliams, and Tatishe Nteta. 2018. "Understanding White Polarization in the 2016 Vote for President: The Sobering Role of Racism and Sexism," Political Science Quarterly, 133 (1): 9-34.			
PTX-077	Valentino, Nicholas A., Fabian G. Neuner, and Matthew Vandenbroek. 2018. "The Changing Norms of Racial Political Rhetoric and the End of Racial Priming," The Journal of Politics 80 (3): 757-771.			
PTX-078	Mutz, Diana C. "Status threat, not economic hardship, explains the 2016 presidential vote," Proceedings of the National Academy of Sciences, 115 (19) E4330-E4339.			
PTX-079	"Senate Bill 2113." LegiScan. LegiScan, April 30, 2021. https://legiscan.com/MS/text/SB2113/id/2546132			
PTX-080	Schaeffer, Katherine. "More than Half of States Will Recognize Juneteenth as an Official Public Holiday in 2023." Prewresearch.Org. Pew, June 9, 2023. https://www.pewresearch.org/short-reads/2023/06/09/more-than-half-of-states-now-recognize-juneteenth-as-an-official-holiday/			
PTX-081	DeeDee Baldwin, Mississippi History Now, "The First Black Legislators in Mississippi," https://mshistorynow.mdah.ms.gov/issue/first-black-legislators-mississippi			
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PTX-084	Statistics of the Presidential and Congressional Election of November 2, 1948. Office of the Clerk of the House of Representatives. Retrieved November 5, 2023, from https://clerk.house.gov/member_info/electionInfo/1948election.pdf			
PTX-085	Tasha S. Philpot, Daron R. Shaw & Ernest B. McGowen, Winning the Race: Black Voter Turnout in the 2008 Presidential Election, Public Opinion Quarterly, Volume 73, Issue 5, 2009, Pages 995–1022			
PTX-086	Seth McKee, M. Hood, & David Hill. (2012). Achieving Validation: Barack Obama and Black Turnout in 2008. State Politics & Policy Quarterly, 12(1), 3-22.			
PTX-087	Jacob R. Brown, 2023. The Obama effect? Race, first-time voting, and future participation. Political Science Research and Methods, 1-18.			
2-26-2024 PTX-088	2008 Mississippi Presidential Election Results: https://www.sos.state.ms.us/elections/2008/08%20Certification%20Results/CertifiedMain.asp			X
2-26-2024 PTX-089	2012 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionresults/2012General/certified%20results/President%20and%20Vice%20President.pdf			X
2-26-2024 PTX-090	2016 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionresults/2016General/Statewide%20Certified%20Results/President%20and%20Vice%20President.pdf			X

Ex. No.	Document Description	Sponsor	ID.	EVID.
2-26-2024 PTX-091	2020 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionresults/2020General/Statewide%20Certified%20Results/President%20and%20Vice%20President_AMENDED.pdf .			X
2-26-2024 PTX-092	Exhibit 6 of Deposition of Madalan Lennep, True the Vote v. Hosemann Declaration, MLC25			X
2-26-2024 PTX-093	Exhibit 7 of Deposition of Madalan Lennep, Thomas v. Bryant Declaration, MLC34			X
2-26-2024 PTX-094	Exhibit 8 of Deposition of Madalan Lennep, Election Commissioner Orientation Slide Decks, MLC07, MLC13, MLC26, MLC30			X
2-26-2024 PTX-095	Exhibit 10 of Deposition of Madalan Lennep, Voter Roll Move, Merge, and Purge, MLC28			X
2-26-2024 PTX-096	Exhibit 11 of Deposition of Madalan Lennep, ECAM Meeting Slide Decks, MLC10, MLC17, MLC29			X
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2-26-2024 PTX-099	Exhibit 18 of Deposition of Madalan Lennep, Email with Booth and Lennep re: Reports, 1/15/19, REL0000000069			X
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2-26-2024 PTX-101	Exhibit 22 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: Conference Call, 12/15/20, MS00000337			X
2-26-2024 PTX-102	Exhibit 25 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: Back in Office, 1/25/21, MS00000005			X
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Ex. No.	Document Description	Sponsor	ID.	EVID.
2-26-2024 PTX-105	Exhibit 28 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: 2019 Gov Race, 6/16/21, MS00000338			X
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2-26-2024 PTX-109	Exhibit 33 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: County Turnout Data, 7/20/21, MS000000002			X
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2-26-2024 PTX-114	Exhibit 38 of Deposition of Madalan Lennep, Clarion-Ledger Article, MLC15			X
2-26-2024 PTX-115	Deposition Transcript of Kyle Kirkpatrick, Esq., taken on December 20, 2023			X
2-26-2024 PTX-116	Exhibit 3 of Deposition of Kyle Kirkpatrick, Esq., Email to Ben Collins from Madalan Lennep re: Letter is Delivered			X
2-26-2024 PTX-117	Exhibit 4 of Deposition of Kyle Kirkpatrick, Esq., <i>Election Commissioner Orientation: Introduction to the Statewide Elections Management System (SEMS)</i>			X
2-26-2024 PTX-118	Exhibit 5 of Deposition of Kyle Kirkpatrick, Esq., <i>SEMS Update – ECAM Convention 2011</i>			X
2-26-2024 PTX-119	Mississippi Code Annotated §§ 23-15-359, 23-15-851; 23-15-833; 23-15-837			X
PTX-120	Associated Press, Special Election Delayed to Fill Mississippi House Seat			X

Ex. No.	Document Description	Sponsor	ID.	EVID.
PTX-121	Order Dispensing With Special Election, September 14, 2021			
PTX-122	Sample Ballot, 2020 HD 88 Special Election			
PTX-123	Election Results, 2021 Special Elections to the Mississippi Senate			
PTX-124	Associated Press, Democrat Abe Hudson resigning from Mississippi House			
PTX-125	Writ of Election as to Senate District 32, July 14, 2021			
PTX-126	Enacted Senate District 2 with Precincts			
2-26-2024 PTX-127	Deposition Transcript of Madalan Lennep, taken on December 18, 2023	_____		X
2-29-2024 PTX-128	Marvin King CV	Dr. Marvin King		X
2-27-2024 PTX-129	Robert E. Lockett, Jr. CV	Dr. Robert Lockett		X
3-6-2024 PTX-130	<i>Nairne v Ardoin</i> , 3:22-cv-00178-SDD-SDJ, Doc. 233, Ruling and Order (excerpts)	_____	X	
PTX-131	2020 Special Election Results – HD 88, SD 15, SD 39, HD 37, HD 66			
PTX-132	2020 Special Elections Sample Ballot			
PTX-133	Clarion Ledger, Governor sets special elections in November to fill 2 empty seats in Mississippi Senate			
PTX-134	Enterprise Tocsin, Abe Hudson Resigns from House Seat, Special Election Set for Nov. 2			
PTX-135	Clarion Ledger, Mississippi Voters Head to Polls Tuesday to Fill Four Open Legislative Seats			
3-6-2024 PTX-136	Deposition Transcript of Dr. Thomas Brunell	_____	X	
3-6-2024 PTX-147	Secretary of State of Mississippi, <i>Voter Registration Drive Organizer Toolkit</i> (Nov. 2021)	_____	X	
3-6-2024 PTX-148	U.S. News, <i>Mississippi voter registration numbers remain steady heading into Tuesday's general election</i> (Nov. 2, 2023), https://apnews.com/article/election-	_____	X	

Ex. No.	Document Description	Sponsor	ID.	EVID.
	2023-mississippi-voter-registration-a4bd134bda9f9063d56952c6f3454706			
PTX-155 3-6-2024	U.S. Census Bureau, <i>Increased Margins of Error in the 5-Year Estimates Containing Data Collected in 2020</i> , https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2022-04.html		X	
PTX-156 3-6-2024	Deposition Transcript of Dr. John Alford		X	